

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

JULIO R. SOTOMAYOR (a/k/a “JACE  
SOTOMAYOR”; “J.R. SOTOMAYOR”;  
“WIZARD”),

Defendant.

Case No. 1:22-cr-0122 (RDA)

**UNOPPOSED MOTION FOR PROTECTIVE ORDER**

The United States, with the consent of the defendant, moves this Court, pursuant to Federal Rule of Criminal Procedure 16(d), to enter into force the attached protective order governing discovery in this matter.

The government plans to produce or otherwise make available to the defendant material that contains personally identifiable information, procurement sensitive and proprietary information, and other confidential and sensitive information, such as personal identifiers, addresses, telephone numbers, and law enforcement material. If this information were to be publicly disclosed, such disclosure might impair the privacy and proprietary rights of third parties and impede law enforcement activities.

Accordingly, the government respectfully requests the entry of a protective order as to all discovery materials provided in this matter. Such materials will be handled pursuant to the procedures outlined in the proposed Order submitted contemporaneously to the Court, and those


materials may only be disclosed or disseminated in accordance with the proposed Order, unless and until that Order is modified by the Court.

The government has contacted defense counsel regarding this motion. Defense counsel does not oppose the entry of the proposed protective order.

Respectfully submitted,

Jessica D. Aber  
United States Attorney

Corey R. Amundson  
Chief, Public Integrity Section

By:   
\_\_\_\_\_  
Edward P. Sullivan  
Special Assistant United States Attorney (LT)  
Senior Litigation Counsel, Public Integrity Section  
Heidi B. Gesch  
Assistant United States Attorney  
United States Attorney's Office  
2100 Jamieson Avenue  
Alexandria, Virginia 22314  
Tel: 703-299-3700  
Edward.P.Sullivan@usdoj.gov  
Heidi.Gesch@usdoj.gov

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record for the defendant.

A handwritten signature in cursive script, appearing to read "E. Sullivan", is positioned above a horizontal line.

Edward P. Sullivan  
Special Assistant United States Attorney (LT)